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**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF NEW YORK**

Dr. FREDERICK K. C. PRICE, an individual,  
  
Plaintiff,

v.

JOHN STOSSEL, an individual, GLENN  
RUPPEL, an individual, AMERICAN  
BROADCASTING COMPANIES, INC., a  
Delaware corporation, ABC INC., a Delaware  
corporation, OLE ANTHONY, an individual,  
TRINITY FOUNDATION, INC., an entity,  
form unknown,  
Defendants.

Civil Action No. 07-CV-11364 (SWK) (THK)

The Honorable Shirley Wohl Kram

NOTICE OF MOTION OF DEFENDANTS  
JOHN STOSSEL, GLENN RUPPEL,  
AMERICAN BROADCASTING  
COMPANIES, INC. AND ABC, INC. TO  
TRANSFER VENUE PURSUANT TO 28  
U.S.C. § 1404(a)

**ORAL ARGUMENT REQUESTED**

**TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE** that upon the Declaration of David E. Fink and the accompanying memorandum of law (collectively, the "Motion to Transfer"), defendants John Stossel, Glenn Ruppel, American Broadcasting Companies, Inc., and ABC, Inc. (collectively, "ABC"), will move this Court, at 500 Pearl Street, New York, New York 10007, on a date and at a time to be designated by the Court, for the entry of an Order, pursuant to 28 U.S.C. § 1404(a),

granting ABC's Motion to Transfer to the United States District Court of the Central District of California. The Motion to Transfer is based on the grounds that convenience of the parties and witnesses and the interests of justice support transfer of this action back to the Central District of California, where the action was originally pending.

ABC respectfully submits its Motion to Transfer pursuant to the Stipulation of Briefing Schedule submitted by Plaintiff Frederick K. C. Price ("Plaintiff"), ABC, Ole Anthony, and Trinity Foundation Inc. (collectively, "Defendants"), whereby: (1) ABC agreed to serve and file its Motion to Transfer on or before March 26, 2008; (2) Plaintiff agreed to serve and file his opposition to the Motion to Transfer on or before April 11, 2008; and (3) ABC agreed to serve and file its reply memorandum of law in support of its Motion to Transfer on or before April 25, 2008.

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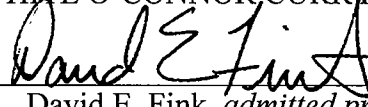
Further, ABC hereby respectfully requests, that the Court schedule oral argument on ABC's Motion to Transfer.

DATED: March 25, 2008

Respectfully Submitted,

WHITE O'CONNOR CURRY LLP

By



David E. Fink, *admitted pro hac vice*

Attorneys for Defendants John Stossel, Glenn Ruppel, American Broadcasting Companies, Inc. and ABC, Inc.